

ADM/TNL

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,)	INDICTMENT
)	
Plaintiff,)	18 U.S.C. § 2
)	18 U.S.C. § 922(g)(1)
v.)	18 U.S.C. § 924(a)(2)
)	18 U.S.C. § 924(d)(1)
(1) DONTA TERRELL STONE ADAMS,)	18 U.S.C. § 924(e)
a/k/a "Marshaun Bradford," and)	26 U.S.C. § 5841
)	26 U.S.C. § 5861(d)
(2) BRANDON DANTE BROOKS-DAVIS,)	26 U.S.C. § 5871
)	28 U.S.C. § 2461(c)
Defendants,)	

THE UNITED STATES GRAND JURY CHARGES THAT:

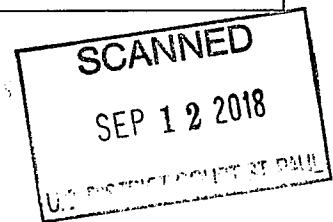
COUNT 1
(Felon in Possession of a Firearm)

On or about August 7, 2018, in the State and District of Minnesota, the defendants,

**DONTA TERRELL STONE ADAMS,
a/k/a "Marshaun Bradford," and
BRANDON DANTE BROOKS-DAVIS,**

each having previously been convicted of crimes described below, each of which was punishable by imprisonment for a term exceeding one year, aiding and abetting and being aided and abetted by one another, knowingly possessed, in and affecting interstate commerce, the following firearms:

Firearm
A Beretta model 92FS 9mm semi-automatic pistol bearing serial number BER021446 ;
A Smith & Wesson model SW9VE 9mm semi-automatic pistol bearing serial number PBU6610; and



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Firearm
A Ruger model P91 DC .40 caliber semi-automatic pistol bearing serial number 34008950.

NOTICE OF PRIOR CONVICTIONS

The allegations of Count 1 of this Indictment are hereby realleged as if set forth herein and incorporated by reference.

1. As to Count 1 of the Indictment, the defendant, **DONTA TERRELL STONE ADAMS**, a/k/a “Marshaun Bradford,” has previously been convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year, namely:

Offense	Place of Conviction	Date of Conviction (On or About)
Aggravated Robbery	Hennepin County, MN	June 28, 2010
Second Degree Riot	Hennepin County, MN	September 22, 2017

and is therefore in violation of Title 18, United States Code, Sections 2, 922(g)(1), and 924(a)(2).

2. As to Count 1 of the Indictment, the defendant, **BRANDON DANTE BROOKS-DAVIS**, has previously been convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year, namely:

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Offense	Place of Conviction	Date of Conviction (On or About)
Violation of No Contact Order	Hennepin County, MN	November 17, 2015
Violation of No Contact Order	Hennepin County, MN	October 25, 2017

and is therefore in violation of Title 18, United States Code, Sections 2, 922(g)(1), and 924(a)(2).

COUNT 2
(Felon in Possession of a Firearm)

On or about August 7, 2018, in the State and District of Minnesota, the defendants,

**DONTA TERRELL STONE ADAMS,
a/k/a "Marshaun Bradford," and
BRANDON DANTE BROOKS-DAVIS,**

each having previously been convicted of the crimes described below, each of which was punishable by imprisonment for a term exceeding one year, aiding and abetting and being aided and abetted by one another, knowingly possessed, in and affecting interstate commerce, Glock model 27 .40 caliber semi-automatic pistol bearing serial number HPB411.

NOTICE OF PRIOR CONVICTIONS

The allegations of Count 2 of this Indictment are hereby realleged as if set forth herein and incorporated by reference.

- As to Count 2 of the Indictment, the defendant, **DONTA TERRELL STONE ADAMS**, a/k/a "Marshaun Bradford," has previously been convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year, namely:

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Offense	Place of Conviction	Date of Conviction (On or About)
Aggravated Robbery	Hennepin County, MN	June 28, 2010
Second Degree Riot	Hennepin County, MN	September 22, 2017

and is therefore in violation of Title 18, United States Code, Sections 2, 922(g)(1), and 924(a)(2).

2. As to Count 2 of the Indictment, the defendant, **BRANDON DANTE BROOKS-DAVIS**, has previously been convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year, namely:

Offense	Place of Conviction	Date of Conviction (On or About)
Violation of No Contact Order	Hennepin County, MN	November 17, 2015
Violation of No Contact Order	Hennepin County, MN	October 25, 2017

and is therefore in violation of Title 18, United States Code, Sections 2, 922(g)(1), and 924(a)(2).

COUNT 3
(Felon in Possession of a Firearm)

On or about August 7, 2018, in the State and District of Minnesota, the defendants,

**DONTA TERRELL STONE ADAMS,
a/k/a "Marshaun Bradford," and
BRANDON DANTE BROOKS-DAVIS,**

each having previously been convicted of crimes described below, each of which was punishable by imprisonment for a term exceeding one year, aiding and abetting and being

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aided and abetted by one another, knowingly possessed, in and affecting interstate commerce, a Glock model 21 .45 caliber semi-automatic pistol bearing serial number BECS686.

NOTICE OF PRIOR CONVICTIONS

The allegations of Count 3 of this Indictment are hereby realleged as if set forth herein and incorporated by reference.

1. As to Count 3 of the Indictment, the defendant, **DONTA TERRELL STONE ADAMS**, a/k/a “Marshaun Bradford,” has previously been convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year, namely:

Offense	Place of Conviction	Date of Conviction (On or About)
Aggravated Robbery	Hennepin County, MN	June 28, 2010
Second Degree Riot	Hennepin County, MN	September 22, 2017

and is therefore in violation of Title 18, United States Code, Sections 2, 922(g)(1), and 924(a)(2).

2. As to Count 3 of the Indictment, the defendant, **BRANDON DANTE BROOKS-DAVIS**, has previously been convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year, namely:

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Offense	Place of Conviction	Date of Conviction (On or About)
Violation of No Contact Order	Hennepin County, MN	November 17, 2015
Violation of No Contact Order	Hennepin County, MN	October 25, 2017

and is therefore in violation of Title 18, United States Code, Sections 2, 922(g)(1), and 924(a)(2).

COUNT 4
(Possession of an Unregistered Firearm)

On or about August 7, 2018, in the State and District of Minnesota, the defendants,

**DONTA TERRELL STONE ADAMS,
a/k/a "Marshaun Bradford," and
BRANDON DANTE BROOKS-DAVIS,**

aiding and abetting and being aided and abetted by one another, did knowingly receive and possess a firearm, that is, a .223 caliber semi-automatic rifle with no manufacturer's stamps, having a barrel of less than 16 inches in length, not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

FORFEITURE ALLEGATIONS

If convicted of any of Counts 1–3 of this Indictment, the defendants shall forfeit to the United States any firearms, accessories and ammunition involved in or used in connection with such violations including, but not limited, to the Beretta model 92FS 9mm semi-automatic pistol bearing serial number BER021446; the Smith & Wesson model SW9VE 9mm semi-automatic pistol bearing serial number PBU6610; the Ruger model P91

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DC .40 caliber semi-automatic pistol bearing serial number 34008950; and the Glock model 21 .45 caliber semi-automatic pistol bearing serial number BECS686, together with ammunition, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

If convicted of Count 4 of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 26, United States Code, Section 5872, in conjunction with Title 28, United States Code, Section 2461(c), any firearm involved in any violation of the National Firearms Act, including a 223 caliber semi-automatic rifle with no manufacturer's stamps, and any associated ammunition.

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON